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Examiner: Smith, Peter J.

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Title: **SYSTEM AND METHOD FOR LOCATING ON A PHYSICAL DOCUMENT
ITEMS REFERENCED IN AN ELECTRONIC DOCUMENT**

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REPLY BRIEF OF APPELLANT

This Reply Brief is in reply to the Examiner's Answer mailed October 27 2006 and the
Supplementary Examiner's Answer mailed December 18,2006.

It should be understood that all citations herein to the Examiner's Answer are directed to
the Supplementary Examiner's Answer mailed December 18,2006.

GROUND OF REJECTION 1

Claims 1-4, 7, 8 and 10 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Robinson *et al.* (hereinafter “Robinson”), “A framework for interacting with paper”, Eurographics ‘97, Volume 16, Number 3 - [www.cl.cam.ac.uk/Research/Origami/Origami1997c/index.html], pages 1-9 in view of Musk *et al.* (hereinafter “Musk”), US 6,148,260 continuation filed 11/8/1996.

Appellant respectfully contends that claim 1 is not unpatentable over Robinson in view of Musk, because Robinson in view of Musk does not teach or suggest each and every feature of claim 1.

Claim 1 - First Issue

As a first example of why claim 1 is not unpatentable over Robinson in view of Musk, Robinson in view of Musk does not teach or suggest the feature: “defining the referenced item in the electronic document, **said electronic document not being derived from the physical document**” (emphasis added).

Appellant notes that the abstract in Robinson recites: “This paper reports on ways of using digitised video from television cameras in user interfaces for computer systems. The DigitalDesk is built around an ordinary physical desk and can be used as such, but it has extra capabilities. A video camera mounted above the desk, pointing down at the work surface, is used to detect where the user is pointing and **to read documents that are placed on the desk.**” (emphasis added).

The preceding quote in Robinsin's abstract teaches deriving an electronic document from a physical document.

The Examiner's Answer argues on page 4: "Robinson teaches wherein the electronic document is not derived from the physical document in section 3, 4, 4.1, and 4.4. Robinson describes here that animated documents are created with a fairly conventional WYSIWYG editor. Thus, the electronic document is created with electronic document editing software and thus is not necessarily derived from a physical document. Robinson does disclose further than the electronic document can additionally be derived by scanning conventional printed documents, however this is in addition to creating the electronic document via electronic document creation software."

In response, Appellant next quotes and analyzes all of the relevant content in Sections 3, 4, 4.1, and 4.4. of Robinson, which the Examiner relies upon, to answer the question of whether Robinson teaches or suggests: "said electronic document not being derived from the physical document".

The pertinent content in Section 3 of Robinson is the first sentence of Section 3 which recites: "The registry provides the central directory service for animated paper documents. It stores the image of each active document and the code of any interactors, together with cross references between these and indexes to identify them". Appellant cannot find any teaching or suggestion in the preceding quote in Section 3 of Robinson of: "said electronic document not being derived from the physical document".

The entire Section 4 of Robinson recites: “The registry is accessed via a set of adaptors that allow the database to be built and edited, imported and exported to other forms of hypertext, and for documents to be printed for animation on a DigitalDesk. ”

The Examiner’s Answer, page 20 misinterprets Section 4 of Robinson by alleging that “the documents maybe created in electronic form prior to being printed out. Robinson offers further evidence of this in section 4... In section 4 that an adaptor may be used to import or export hypertext. By enabling the registry to import hypertext, Robinson is teaching that the document may have an electronic origin.”

In response, Appellant asserts that the language “a set of adaptors that allow the database to be built and edited, imported and exported to other forms of hypertext” in Section 4 of Robinson does not indicate that an adaptor may be used to import or export hypertext as alleged by the Examiner. Rather, the preceding quote in Section 4 of Robinson indicates that the database is allowed to be imported and exported to other forms of hypertext. Moreover, the hypertext is not a document, but rather is “text that includes links or shortcuts to other documents, allowing the reader to easily jump from one text to related texts, and consequentially from one idea to another, in a non-linear fashion. Coined by Ted Nelson in 1965” (see <http://www.csgnetwork.com/glossaryh.html>). Appellant cannot find any teaching or suggestion in the preceding quote in Section 4 of Robinson of: “said electronic document not being derived from the physical document”.

The initial portion of Section 4.1 of Robinson recites: “Animated documents are created with a fairly conventional WYSIWYG editor. Text and diagrams are entered and amended in the

usual way, building up a collection of rendering information in primary pseudo-window leaves. However, it is also possible to mark areas of the document as hyperlinks and to associate interactors with them. This adds code references to the rendering information.”

With respect to the preceding quote from the initial portion of Section 4.1 of Robinson and in consideration of the reference in the Examiner’s Answer to the WYSIWYG editor in Robinson, Appellant acknowledges that a conventional WYSIWYG editor is electronic document editing software as the Examiner indicates. However, the use of a conventional WYSIWYG editor does resolve the issue in the language of claim 1 of whether Robinson teaches or suggests that the document text being edited by the WYSIWYG editor is not derived from a physical document. This issue can be resolved according to the argument in the Examiner’s Answer if Robinson teaches or suggests that the document text being edited by the WYSIWYG editor is derived from an electronic document or is created electronically from scratch. However, Appellant cannot find any such teaching or suggestion in the first portion of Section 4.1 of Robinson, where Robinson discusses the use of the WYSIWYG editor. Therefore, Appellant concludes that Robinson does not teach or suggest in the initial portion of Section 4.1 that the document text being edited by the WYSIWYG editor is not derived from a physical document, because Robinson does not indicate that the source of the text being edited by the WYSIWYG editor is not derived from a physical document.

The remaining portion of Robinson, Section 4.1 recites: “One version of the editor actually operates on the DigitalDesk, which means that text, diagrams and interactors from **other printed documents** can be copied into the new document. If the **other printed documents** are active documents known to the system, this copying is entirely digital, just as it would be in a

conventional word processor. However, text and pictures can also be copied from **conventional printed documents** by using the overhead camera to capture an image and passing any text through an optical character recognition system.” (emphasis added).

The previously quoted remaining portion of Robinson, Section 4.1 explicitly teaches deriving an electronic document from a physical document, and does not teach or suggest that an electronic document is not derived from a physical document.

The entire Section 4.4 of Robinson recites: “Other forms of hypertext can be absorbed into the animated paper document system. For example, paper access to the World Wide Web [Berners-Lee et al 1944] is possible through an adaptor. Given a uniform resource locator (URL), this captures the information on the associated web page in the registry. The page can then be printed on paper and links activated by placing the paper on a DigitalDesk and pointing. The page's identifier and the co-ordinates of the link are looked up in the registry to yield the appropriate activity and the results projected back onto the desk... The interactions afforded by animated paper are considerably richer than straightforward HTML but if a document is sufficiently simple, it can be exported as HTML. “

The Examiner's Answer, page 20 misinterprets Section 4.4 of Robinson by alleging that “in section 4.4 teaches that given URL, the information can be captured on the associated web page in the registry. Again, this demonstrates that the origin of the document in the registry may be electronic and not paper.”

In response, Appellant asserts that the Examiner's Answer does not provide an analysis of the language of Section 4.4 of Robinson to justify the preceding allegation by the Examiner. The

Examiner has cited one sentence (“Given a uniform resource locator (URL), this captures the information on the associated web page in the registry.”) in Section 4.4 of Robinson and has interpreted this one sentence without consideration of how this one sentence relates to the remainder of Section 4.4 of Robinson. Appellant asserts that Section 4.4 of Robinson needs to be analyzed carefully in order to arrive at the meaning of “Given a uniform resource locator (URL), this captures the information on the associated web page in the registry” in the context of the entire Section 4.4 of Robinson.

Appellant asserts that the preceding quote from Robinson is logically consistent with the remainder of Section 4.4 of Robinson if the URLs are the “links activated by placing the paper on a DigitalDesk and pointing”. The links (i.e. URLs) are not electronic documents stored in the registry, but rather are interaction objects within the electronic document, such that the URLs may be activated for access to the World Wide Web. Thus the URLs are hypertext objects that are absorbed into electronic documents of the animated paper document system, so that access to the World Wide Web may be activated by being pointed to on paper on a DigitalDesk after the paper is printed from the electronic document containing the URLs. Given the stated functionality of providing “paper access to the World Wide Web”, the “appropriate activity” triggered by the co-ordinates of the link in the registry is the activity of accessing the website in the World Wide Web that is associated with the link in the registry. Appellant maintains that Robinson does not disclose that content of any document pointed to by any URL is stored in any electric document in Robinson’s registry, and accordingly does not teach or suggest that an electronic document is not derived from a physical document.

The preceding discussion has analyzed all language in Sections 3, 4, 4.1, and 4.4. of Robinson that the Examiner's Answer relies on with respect to the feature in claim 1 of: "said electronic document not being derived from the physical document". Based on the preceding arguments and accompanying analysis, Appellant respectfully contends that the Examiner's Answer has not cited anything in Robinson that persuasively supports the Examiner's allegation that Robinson teaches that the electronic document is not derived from the physical document. All of the content in Sections 3, 4, 4.1, and 4.4. of Robinson relied upon in Examiner's Answer is consistent with not teaching that the electronic document is not derived from the physical document.

Claim 1 - Second Issue

As a second example of why claim 1 is not unpatentable over Robinson in view of Musk, Robinson in view of Musk does not teach or suggest the feature: "determining geographic coordinates of the referenced item; defining the geographic link to the physical document; and **encoding the geographic coordinates in the geographic link**" (emphasis added).

As to encoding the coordinates of the referenced item of the electronic document in the link to the physical document, the Examiner's Answer, page 4 argues: "Robinson teaches determining the absolute coordinates of the referenced item in sections 3 and 4.4. Robinson teaches ... encoding the absolute coordinates in the link in sections 3 and 4.4."

In response, Appellant respectfully contends that Sections 3 and 4.4 of Robinson do not disclose said encoding the absolute coordinates in the link to the physical document as alleged by the Examiner's Answer.

Appellant notes the only mention of co-ordinates in Section 3 of Robinson is : “The page representation acts as an index identifying the interactor corresponding to particular **co-ordinates** on a page” (emphasis added), which most certainly does not disclose encoding the coordinates of the referenced item of the electronic document in the link to the physical document as required by claim 1.

Appellant notes the only mention of co-ordinates in Section 4.4 of Robinson is “The page's identifier and the **co-ordinates** of the link are looked up in the registry to yield the appropriate activity and the results projected back onto the desk” (emphasis added), which most certainly does not disclose encoding the coordinates of the referenced item of the electronic document in the link to the physical document as required by claim 1. In other words, storing the coordinates in the registry does not imply encoding the coordinates in the link. The coordinates could be stored anywhere in the registry not within the link and still be accessible.

The Examiner's Answer, page 22 further argues: “The Examiner's position is that for Robinson to identify the coordinates from the link, as is taught in section 4.4, and use the coordinates to look up in the registry, the coordinates are thus encoded in the link on the document. The Examiner maintains that Robinson does teach determining coordinates of the referenced item, defining the link to the physical document, and encoding the coordinates in the link under the broadest reasonable interpretations of coordinates.”

In response, Appellant cite the pertinent language in Section 4.4 of Robinson (relied upon by the Examiner): “The page's identifier and the co-ordinates of the link are looked up in the registry ...”, which supports Appellant's contention that the coordinates could be stored anywhere in the registry not within the link and still be accessible. Appellant respectfully contends that any

data in the registry that associates the link with the location in the registry where the coordinates are stored would enable the coordinates to be identified from the link. The Examiner's Answer has not cited any language that could be interpreted as teaching or suggesting encoding the coordinates in the link.

With respect to encoding the **geographic** coordinates in the link, the Examiner's Answer, pages 4-5 argues: "Robinson does not teach wherein the referenced item is related to a geographic location or wherein the absolute coordinates include geographic coordinates. Musk does teach a map document which contains reference items related to geographic locations and identified by geographic coordinates in fig. 2 and col. 1 lines 32-57. The map facilitates a user search of business services in a particular geographic area... It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined Musk into Robinson to have created the claimed invention. It would have been obvious and desirable to have used the map and geographic coordinate teachings of Musk to have improved the enhanced document of Robinson so that the paper document of Robinson would have presented a map in paper form which provided geographic coordinates to reference items on the map to help a user find and locate available business services on the map. Robinson teaches in the last three sentences of section 1 that its system has been re-engineered for more general use. Maps are traditionally composed of paper and thus would have been a good candidate for the general use DigitalDesk system taught by Robinson."

In response, Appellant respectfully contends that the preceding statement made by the Examiner's Answer does not allege that Musk discloses encoding the geographic coordinates in the geographic link. In addition, Appellant asserts that a teaching of identifying a geographic

location through use of geographic coordinates does not suggest encoding the geographic coordinates in a geographic link. Appellant further asserts that Musk does not anywhere suggest encoding the geographic coordinates in a geographic link.

Furthermore, the Examiner's Answer appears to be arguing that the coordinates allegedly encoded in the link of Robinson should be modified, in view of Musk, to be geographical coordinates. However, if the coordinates encoded in the link are geographical coordinates instead of coordinates relating to a position on the physical document, then the registry would be unable to use the geographical coordinates to identify where the link is located on the physical document, since the geographical coordinates are coordinates of a geographical location appearing on the paper document. The geographical coordinates therefore refer to coordinates of the geographical location on a map represented as the claimed physical document according to the argument in the Examiner's Answer, rather than to coordinates of the link with respect to position on the physical document. Therefore, the suggestion in the Examiner's Answer to modify Robinson by the alleged teaching of Musk does not seem to make sense.

As to the Examiner's reliance on Section 1 of Robinson, Appellant notes that the last three sentences of Robinson, Section 1 recite: "The whole system has now been re- engineered for more general use. In particular, questions of scale and of generality have been addressed. The resulting framework is now being used for further experiments on new applications of the technology."

Appellant respectfully contends that the preceding quote from Robinson, in the last three sentences of Section 1, is non-specific, vague, and does not suggest modifying Robinson to "present ... a map in paper form which provided geographic coordinates to reference items on the

map to help a user find and locate available business services on the map”.

Appellant respectfully contend that there is nothing disclosed in Robinson that suggests the claimed feature of “determining geographic coordinates of the referenced item; defining the geographic link to the physical document; and encoding the geographic coordinates in the geographic link.” The only application area suggested by Robinson as being suitable for using Robinson’s system is the application area of teaching mathematics (see Robinson, Section 6). Therefore, the suggested modification of Robinson in the Examiner’s Answer, with respect to the limitations pertaining to geographical coordinates, is not obvious.

Claim 1 and Dependent Claims 2-4, 7, 8 and 10: Conclusion

Based on the preceding arguments, Appellant respectfully maintains that claim 1 is not unpatentable over Robinson in view of Musk, and that claim 1 is in condition for allowance. Since claims 2-4, 7, 8 and 10 depend from claim 1, Appellant contends that claims 2-4, 7, 8 and 10 are likewise in condition for allowance.

Claim 2: Additional Argument

In addition with respect to claim 2, Robinson in view of Musk does not teach or suggest the feature: “wherein the step of encoding further includes the step of encoding an address of a second electronic document in the geographic link”.

The Examiner’s Answer, page 5 argues: “Regarding dependent claim 2, Robinson teaches encoding an address of a second electronic document in the link in sections 3, 4, 4.1, and 4.4. The electronic document paired with the paper document contains hybrid links composed of the

interactor coordinates and the associated target location stored in the registry to point to other electronic resources such as other electronic documents.”

In response, Appellant cannot find any disclosure anywhere in Robinson of a geographic link that includes both geographic coordinates and an address of a second electronic document as required by claim 2. Since the Examiner’s Answer has not identified anything in Robinson disclosing a geographic link that includes both geographic coordinates and an address of a second electronic document, Appellant maintains that the Examiner’s Answer has not established a *prima facie* case of obviousness in relation to claim 2.

Claim 4: Additional Argument

In addition with respect to claim 4, Robinson in view of Musk does not teach or suggest the feature: “storing the geographic coordinates in a table”.

The Examiner’s Answer, page 6 argues: “Robinson teaches storing the coordinates in a table in sections 3 and 4.4. The each page representation in the registry maintains the associations between the coordinates and the interactors, or reference items, on the page.”

In response, Appellant contends that the coordinates are stored in the registry (see Robinson, section 4.4). However, Robinson does not teach that the coordinates are stored in a table. Appellant contends that a table is only one storage format of a multiplicity of storage format that could be used to store data. Appellant has searched the text of Robinson and has found that the word “table” does not appear anywhere within the text of Robinson.

The Examiner’s Answer, page 25 further argues: “Robinson teaches in sections 3 and 4.4 that coordinates are stored in the table so that they can be looked up to yield the appropriate

activity. Since the coordinates are looked up in the registry table, they **must** be stored in the table.” (emphasis added)

In response, Appellant reiterates that a table is only one storage format of a multiplicity of storage format that could be used to store data. Therefore, the Examiner’s assertion that the coordinates **must** be stored in the table is incorrect.

Appellant reiterate that Robinson does not teach in sections 3 and 4.4 that coordinates are stored in a table. The Examiner’s Answer has not identified a specific quote in sections 3 and 4.4 of Robinson that allegedly teaches that coordinates are stored in a table.

Claim 7: Additional Argument

In addition with respect to claim 7, Robinson in view of Musk does not teach or suggest the feature: “the physical document includes a map”.

The Examiner’s Answer argues: “Regarding dependent claim 7, Robinson does not teach wherein the referenced item is related to a geographic location; the absolute coordinates include geographic coordinates; and wherein the physical document includes a map- Musk does teach a map document which contains reference items related to geographic locations and identified by geographic coordinates. The map facilitates a user search of business services in a particular geographic area.... It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined Musk into Robinson to have created the claimed invention. It would have been obvious and desirable to have used the map and geographic coordinate teachings of Musk to have improved the enhanced document of Robinson so that the paper document of Robinson would have presented a map in paper form which provided

geographic coordinates to reference items on the map to help a user find and locate available business services on the map. Robinson teaches in the last three sentences of section 1 that its system has been re-engineered for more general use. Maps are traditionally composed of paper and thus would have been a good candidate for the general use DigitalDesk system taught by Robinson.”

In response, Appellant notes that the last three sentences of Robinson, Section 1 recites: “The whole system has now been re- engineered for more general use. In particular, questions of scale and of generality have been addressed. The resulting framework is now being used for further experiments on new applications of the technology.”

Appellant respectfully contends that the preceding quote from Robinson, in the last three sentences of Section 1, is non-specific, vague, and does not suggest modifying Robinson by having the physical document includes a map. Appellant asserts that there is absolutely no suggestion in Section 6 of Robinson of using Robinson’s system such that “the physical document includes a map”.

Appellant notes that the Examiner’s Answer has not cited Robinson for a suggestion that has a relationship to the claimed feature of: “the physical document includes a map”. Indeed, there is no such suggestion in Robinson. Therefore, the suggested modification of Robinson in the Examiner’s Answer is not obvious.

Claim 8: Additional Argument

In addition with respect to claim 8, Appellant respectfully contends that Robinson does not teach the feature: “the electronic document is a hyper text markup language document; and

the geographic link uses syntactic conventions of hyper text markup language”.

The Examiner’s Answer, page 6 argues: “Regarding dependent claim 8, Robinson teaches wherein the electronic document is a hyper text markup language document and wherein the link uses syntactic conventions of hyper text markup language in the abstract and sections 4, 4.1, and 4.4.”.

In response, Appellant contends that a search of the text of Robinson shows that Robinson does not teach “the geographic link uses syntactic conventions of hyper text markup language”. Appellant maintains that the abstract and sections 4, 4.1, and 4.4 in Robinson do not teach or suggest the preceding feature of claim 8 as alleged by the Examiner’s Answer.

The Examiner’s Answer, page 26 further argues that “Robinson teaches in section 4.4 that the electronic documents maybe imported from HTML documents and therefore teaches the limitations of claim 8.... Robinson clearly teaches that given a URL, the information on an associated web page is imported from the web page. See section 4.4 "Import and export", first paragraph.”

In response, Appellant contends that Robinson, Section 4.4 does not teach that the electronic documents may be **imported** from HTML documents, but instead teaches that a document can be **exported** as HTML.

Therefore, Robinson does not disclose the preceding feature of claim 8.

Claim 10: Additional Argument

In addition with respect to claim 10, Robinson in view of Musk does not teach or suggest the feature: “wherein the geographic coordinates include longitude and latitude” in combination with the feature of “encoding the geographic coordinates in the geographic link”.

The Examiner's Answer, page 7 argues: "Regarding dependent claim 10, Robinson does not teach wherein the geographic coordinates include longitude and latitude- Musk does teach wherein the geographic coordinates include longitude and latitude in col. 3 lines 42-44. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined Musk into Robinson to have created the claimed invention. It would have been obvious and desirable to have used the longitude and latitude geographic coordinates to have improved Robinson so that the map paper document could have been used and interacted with using the DigitalDesk. Robinson teaches absolute coordinates relating to reference items on the document, but not longitude and latitude geographic coordinates, because Robinson does not specifically discuss a map example. It would have been obvious and desirable to have enhanced a traditional paper map document with the electronic reference information as taught by Robinson and Musk so that a user could have received detailed information about businesses and services available in the area displayed by the map."

In response, Appellant notes that the Examiner's Answer has not cited a prior art reference suggesting that encoding the longitude and latitude in the geographic link would enable a user to receive detailed information about businesses and services available in the area displayed by the map. In fact even without reference to prior art, it is not clear as to how encoding the longitude and latitude in the geographic link would enable a user to receive detailed information about businesses and services available in the area displayed by the map. Therefore the reason in the Examiner's Answer for modifying Robinson by including the preceding feature of claim 10 is not persuasive.

Appellant notes that the Examiner's Answer has not cited anything in Robinson that

suggests the claimed feature of encoding the longitude and latitude in the geographic link.

Indeed, there is no such suggestion in Robinson. Appellant further notes that the Examiner's Answer has not cited Musk for a suggestion of the claimed feature of encoding the longitude and latitude in the geographic link. Indeed, there is no such suggestion in Musk. Therefore, the suggested modification of Robinson in the Examiner's Answer is not obvious.

GROUND OF REJECTION 2

Claims 5-6, 9, 18-25 and 31-38 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Robinson *et al.* (hereinafter “Robinson”), “A framework for interacting with paper”, Eurographics ‘97, Volume 16, Number 3 - [www.cl.cam.ac.uk/Research/Origami/Origami1997c/index.html], pages 1-9 in view of Musk *et al.* (hereinafter “Musk”), US 6,148,260 continuation filed 11/8/1996 and Thompson *et al.* (hereinafter “Thompson”), US 5,986,401 patented 11/16/1999.

Claims 5-6 and 9

Since claims 5-6 and 9 depend from claim 1, which Appellant has argued *supra* to not be unpatentable over Robinson in view of Musk under 35 U.S.C. §103(a), Appellant maintains that claims 5-6 and 9 are likewise not unpatentable over Robinson in view of Musk and Thompson under 35 U.S.C. §103(a).

Claim 5: Additional Argument

In addition with respect to claim 5, Robinson in view of Musk and Thompson does not teach or suggest the feature: “computing foil coordinates on an opto-touch foil from the geographic coordinates of the referenced item and a calibration relationship, said opto-touch foil being aligned on the physical document, said calibration relationship being between geographic coordinates of a selected calibration location and calibration foil coordinates of the selected calibration location on the opto-touch foil, said selected calibration point having been selected from the electronic document and said opto-touch foil having been selectively touched or pressed

at a position corresponding to where the calibration location appears in the physical document”.

For example, Appellant contends that there is no disclosure in Robinson of any calibration relationship, and specifically there is no disclosure in Robinson of the claimed calibration relationship between geographic coordinates of a selected calibration location and calibration foil coordinates of the selected calibration location on the opto-touch foil. The Examiner’s Answer has not cited anything in Robinson to support the allegations in the Examiner’s Answer about said calibration relationship in Robinson.

The Examiner’s Answer, page 8 argues: “Robinson teaches a calibration relationship, the desk being aligned with the physical document, and the calibration relationship being between the absolute coordinates of a selected calibration location and calibration camera coordinates of the selected calibration location on the desk, the selected calibration point having been selected from the electronic document and the desk having been selectively activated at a position corresponding to where the calibration location appears in the physical document in section 4.2.

The Examiner’s Answer, page 27 further argues: “Robinson shows in figure 2 and describes in section 4.2 that marks on the printed page are used to facilitate the recognition and location on the desktop. Determining the location is the calibration relationship and requires computing coordinates so that the interactors can be correctly recognized.”

In response, Appellant acknowledges that the marks on the printed page, as described by Robinson in Section 4.2 in relation to Figure 2, pertains to a calibration relationship. However, Robinson does not disclose the calibration relationship associated with marks on the printed page is “between geographic coordinates of a selected calibration location and calibration foil coordinates of the selected calibration location on the opto-touch foil” as required by claim 5.

Thus, Robinson does not teach the claimed calibration relationship.

With respect to the claimed opto-touch foil, the Examiner's Answer, page 8 argues: "Robinson does not teach computing foil coordinates because Robinson uses a camera location system instead of a touch foil system. However, **Robinson does teach the possibility of using a touch foil to identify coordinates instead of a camera in section 5.** Thus, Robinson teaches that foil coordinates could have been implemented in place of camera coordinates." (emphasis added)

In response, Appellant contends that there is no disclosure in Section 5 of Robinson of "the possibility of using a touch foil to identify coordinates instead of a camera in any calibration relationship". Therefore, the conclusion in the Examiner's Answer that "Robinson teaches that foil coordinates could have been implemented in place of camera coordinates" is erroneous.

The Examiner's Answer, pages 28-29 further argues: "The Examiner maintains the position that the graphics tablet taught by Robinson in section 5 is the claimed touch-foil and believes addition implied evidence that , the graphics tablet is a touch foil because Robinson indicates that the graphics tablet might not work well when using a stack of papers. The Examiner believes this implies the touch foil might not accurately assess touches from the pen due to the thickness of the stack of papers."

In response, Appellant cites the relevant text in Robinson, Section 5: "It would be possible to use a conventional graphics tablet, but the light pen has the advantage that it works perfectly well over a stack of paper on the desk."

Appellant respectfully contends that the preceding quote from Section 5 of Robinson does

not support the Examiner's argument that "the position that the graphics tablet taught by Robinson in section 5 is the claimed touch-foil and believes addition implied evidence that . the graphics tablet is a touch foil because Robinson indicates that the graphics tablet might not work well when using a stack of papers".

Appellant asserts that the fact that the graphics tablet might not work well when using a stack of papers does not imply that the graphics tablet taught by Robinson in Section 5 is the claimed touch-foil. In fact, Robinson teaches explicitly in Section 5 that "a pen with a light-emitting diode in its tip is used for pointing ... [because] the light pen has the advantage that it works perfectly well over a stack of paper on the desk". Thus, the allegation in the Examiner's Answer that Robinson, Section 5 teaches the claimed touch-foil is incorrect. Moreover, Robinson, Section 5 further recites that "[t]his is **recognised by the camera system** and converted to co-ordinates using a transformation calculated by occasional registration", which negates the allegation in the Examiner's Answer that "Robinson does teach the possibility of using a touch foil to identify coordinates instead of a camera in section 5".

The Examiner's Answer, page 28 further argues: "The Examiner notes that Robinson teaches providing visual feedback in fig. 1 and section 5. Thompson teaches a TOLED in the abstract and fig. 2, one of the basic and notoriously well known uses of a display is to provide feedback to a user. Since Robinson teaches providing visual feedback, and Thompson provides an alternate technology for providing the visual feedback, the Examiner maintains that the combination of Robinson, Musk and Thompson teaches and suggests a TOLED display providing feedback to a user."

In response, Appellant notes that the Examiner's Answer argues that the TOLED display

would replace the camera in Robinson's system, which would destroy Robinson's system since the camera is a fundamental and essential aspect of Robinson's system. For example, see Robinson, abstract, first sentence ("*This paper reports on ways of using digitised video from television cameras in user interfaces for computer systems*" (emphasis added)). There is no suggestion anywhere in Robinson of an alternative to using the camera.

Claim 6: Additional Argument

In addition with respect to claim 6, Robinson in view of Musk does not teach or suggest the feature: "storing ... the geographic coordinates in a table".

The Examiner's Answer, page 6 argues: "Robinson teaches ... absolute coordinates in table called a page representation in section 3 and 4.4." In addition, the Examiner's Answer, page 29 argues: "The Examiner maintains that the registry described in section 3 organizes electronic document data and reads upon a table."

In response, Appellant contends that there is no disclosure in Robinson that teaches or suggests that a page representation in Robinson's registry comprises a table. Appellant contends that a table is only one storage format of a multiplicity of storage format that could be used to store data. Appellant has searched the text of Robinson and has found that the word "table" does not appear anywhere within the text of Robinson.

The Examiner's Answer further argues: "Robinson does not teach storing foil coordinates because Robinson uses a camera location system instead of a touch foil system. However, Robinson does teach the possibility of using a touch foil to identify coordinates instead of a

camera in section 5. Thus, Robinson teaches that foil coordinates could have been implemented in place of camera coordinates.... It would have been obvious to one of ordinary skill in the art at the time the invention was made to have modified the DigitalDesk system of Robinson to have created the claimed invention using the touch foil teaching of Robinson in section 5. It would have been obvious and desirable to have used a touch foil instead of a camera system as taught in Robinson so that the location tracking would not have been disrupted by visually blocking the line of sight between the camera lens and the stylus accidentally with the users hand or other object.”

In response, Appellant contends that the suggestion in the Examiner’s Answer of using the touch foil instead of a camera in Robinson is not persuasive. Robinson does not teach use of foil coordinates in place of camera coordinates as alleged by the Examiner’s Answer, but instead teaches that a graphics tablet could be used. Appellant maintains that a use of a graphics tablet does not imply or require use of a touch foil system. In addition, Robinson teaches away from use of a graphics tablet by reciting in the third paragraph of Robinson, Section 5: “It would be possible to use a conventional graphics tablet, but the light pen has the advantage that it works perfectly well over a stack of paper on the desk.”

In addition, Appellant notes that the Examiner’s Answer argues that a touch foil would replace the camera in Robinson’s system, which would destroy Robinson’s system since the camera is a fundamental and essential aspect of Robinson’s system. For example, see Robinson, abstract, first sentence (“*This paper reports on ways of using digitised video from **television cameras** in user interfaces for computer systems*” (emphasis added)). There is no suggestion anywhere in Robinson of an alternative to using the camera.

Claim 9: Additional Argument

In addition with respect to claim 9, Robinson in view of Musk does not teach or suggest the feature: “wherein the opto-foil comprises a touch foil and a transparent light emitting foil such that the touch foil is adapted to being directly touched or pressed and the light emitting foil is disposed between the touch foil and the physical document”.

The Examiner’s Answer, page 10 argues: “Regarding dependent claim 9, Robinson does not teach use of an opto-touch foil because Robinson uses a camera-projector system to read input from the user and display feedback to the user. However, Robinson does teach the possibility of using a touch foil to identify coordinates instead of a camera in section 5. Thompson teaches a transparent organic LED (TOLED) display for presenting feedback to a user in the abstract and fig. 2. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined Thompson and Robinson to have created the claimed invention. It would have been obvious and desirable to have used the touch foil teaching of Robinson and the TOLED of Thompson to have improved Robinson so that the position could have been sensed and feedback presented to the user without the user's hand or input pen interfering with either the sight of the input camera or the projection of the feedback projector of Robinson.”

In response, Appellant contends that the argument in the Examiner’s Answer is based on use of opto-touch foil coordinates instead of a camera coordinates, which Appellant considers to not be persuasive because Robinson does not teach the possibility of using opto-touch foil coordinates in place of camera coordinates as alleged by the Examiner’s Answer, but instead teaches that a graphics tablet could be used. Appellant maintains that a use of a graphics tablet

does not imply or require use of an opto-touch foil system comprising a touch foil. In addition, Robinson teaches away from use of a graphics tablet by reciting in the third paragraph of Robinson, Section 5: “It would be possible to use a conventional graphics tablet, but the light pen has the advantage that it works perfectly well over a stack of paper on the desk.”

In addition, Appellant notes that the Examiner’s Answer argues that an opto-touch foil would replace the camera in Robinson’s system, which would destroy Robinson’s system since the camera is a fundamental and essential aspect of Robinson’s system. For example, see Robinson, abstract, first sentence (“*This paper reports on ways of using digitised video from television cameras in user interfaces for computer systems*” (emphasis added)). There is no suggestion anywhere in Robinson of an alternative to using the camera.

Claims 18-25 and 31-38

Appellant respectfully contends that claim 18 is not unpatentable over Robinson in view of Musk and Thompson because Robinson in view of Musk and Thompson does not teach or suggest each and every feature of claim 18.

Claims 18 and 31 - First Issue

As a second example of why claims 18 and 31 are not unpatentable over Robinson in view of Musk and Thompson, Robinson in view of Musk and Thompson does not teach or suggest the feature: “said electronic document not being derived from the physical document”. Appellant refers to the reasons presented *supra* in conjunction with Claim 1 - First Issue as to

why Robinson in view of Musk does not teach or suggest the feature: “said electronic document not being derived from the physical document”.

Claims 18 and 31 - Second Issue

As a second example of why claims 18 and 31 are not unpatentable over Robinson in view of Musk and Thompson, Robinson in view of Musk and Thompson does not teach or suggest the feature:

“calibrating an opto-touch foil that is aligned on the physical document, said calibrating comprising processing a calibration location comprised by a plurality of locations appearing in the physical document and being referred to in an electronic document, ... , said processing generating a calibration relationship between the geographic coordinates of the calibration location and calibration foil coordinates of the opto-touch foil, said calibration foil coordinates corresponding to where the calibration location appears in the physical document” (claim 18);
and

“means for calibrating an opto-touch foil that is aligned on the physical document, said means for calibrating comprising means for processing a calibration location comprised by a plurality of locations appearing in the physical document and being referred to in an electronic document, ... , said means for processing adapted to generate a calibration relationship between the geographic coordinates of the calibration location and calibration foil coordinates of the opto-touch foil, said calibration foil coordinates corresponding to where the calibration location appears in the physical document” (claim 31).

The Examiner’s Answer, page 10 argues: “Robinson teaches calibrating a

camera-projector system that is aligned on a physical document in fig. 1 and section 4.3.

Robinson teaches wherein the calibrating comprises processing a calibration location comprised by a plurality of locations appearing in the physical document and being referred to in an electronic document in section fig. 2 and section 4.2”.

The Examiner’s Answer, page 31 further argues: “Robinson shows in figure 2 and describes in section 4.2 that marks on the printed page are used to facilitate the recognition and location on the desktop. Determining the location is the calibration relationship and requires computing coordinates so that the interactors can be correctly recognized.”

In response, Appellant acknowledges that the marks on the printed page, as described by Robinson in Section 4.2 in relation to Figure 2, pertains to a calibration relationship. However, Robinson does not disclose the calibration relationship associated with marks on the printed is “between the geographic coordinates of the calibration location and calibration foil coordinates of the opto-touch foil, said calibration foil coordinates corresponding to where the calibration location appears in the physical document” as required by claim 18 and 31. In addition, Robinson does not disclose the calibration location comprised by a plurality of locations appearing in the physical document and being referred to in an electronic document. Thus, Robinson does not teach the claimed calibration relationship.

The Examiner’s Answer, page 12 additionally argues: “Robinson does not teach use of an opto-touch foil because Robinson uses a camera projector system to read input from the user and display feedback to the user. Robinson teaches the consideration of a touch foil alternate position sensing system in section 5. Thompson teaches a transparent organic LED (TOLED) display for presenting feedback to a user in the abstract and fig. 2. It would have been obvious to one of

ordinary skill in the art at the time the invention was made to have combined Thompson and Robinson to have created the claimed invention. It would have been obvious and desirable to have used the touch foil taught by Robinson and the TOLED of Thompson to have improved Robinson so that the position could have been sensed and feedback presented to the user without the user's hand or input pen interfering with either the sight of the input camera or the projection of the feedback projector of Robinson”.

In response, Appellant contends that the argument in the Examiner’s Answer is based on use of opto-touch foil coordinates instead of a camera coordinates, which Appellant considers to not be persuasive because Robinson does not teach use of opto-foil coordinates in place of camera coordinates as alleged by the Examiner’s Answer, but instead teaches that a graphics tablet could be used. Appellant maintains that a use of a graphics tablet does not imply or require use of an opto- touch foil system. In addition, Robinson teaches away from use of a graphics tablet by reciting in the third paragraph of Robinson, Section 5: “It would be possible to use a conventional graphics tablet, but the light pen has the advantage that it works perfectly well over a stack of paper on the desk.”

In addition, Appellant notes that the Examiner’s Answer argues that an opto-touch foil would replace the camera in Robinson’s system, which would destroy Robinson’s system since the camera is a fundamental and essential aspect of Robinson’s system. For example, see Robinson, abstract, first sentence (“*This paper reports on ways of using digitised video from television cameras in user interfaces for computer systems*” (emphasis added)). There is no suggestion anywhere in Robinson of an alternative to using the camera.

Claims 18 and 31 - Third Issue

As a third example of why claims 18 and 31 are not unpatentable over Robinson in view of Musk and Thompson, Robinson in view of Musk and Thompson does not teach or suggest the feature: “for each location of the plurality of locations, computing foil coordinates of the opto-touch foil corresponding to where each location appears in the physical document, said computing utilizing the geographic coordinates of each location and the calibration relationship”.

The Examiner’s Answer , page 11 argues: “Robinson teaches for each location of the plurality of locations, computing camera coordinates of the camera-projector system corresponding to where each location appears in the physical document, the computing utilizing the absolute coordinates of each location and the calibration relationship in fig. 2 and sections 4.2 and 5.”

In response, Appellant respectfully contends that there is no disclosure in Robinson that the computing of camera coordinates of the camera-projector system (corresponding to where each location appears in the physical document) utilizes the absolute coordinates of each location and the calibration relationship.

The Examiner’s Answer, page 32 further argues: “Robinson shows in figure 2 and describes in section 4.2 that marks on the printed page are used to facilitate the recognition and location on the desktop. Determining the location is the calibration relationship and requires computing coordinates so that the interactors can be correctly recognized.”

In response, Appellant acknowledges that the marks on the printed page, as described by Robinson in Section 4.2 in relation to Figure 2, pertains to a calibration relationship. However, the “location”: referred to by the Examiner’s Answer is the location of the physical document on

the desktop, as stated in Robinson, Section 4.2, and Robinson does not disclose the calibration relationship associated with marks on the printed page is “between the geographic coordinates of the calibration location and calibration foil coordinates of the opto-touch foil, said calibration foil coordinates corresponding to where the calibration location appears in the physical document” as required by claims 18 and 31. Thus, Robinson does not teach the preceding feature of claims 18 and 31.

Based on the preceding arguments, Appellant respectfully maintains that claims 18 and 31 are not unpatentable over Robinson in view of Musk, and that claims 18 and 31 are in condition for allowance. Since claims 19-25 depend from claim 18, Appellant contends that claims 19-25 are likewise in condition for allowance. Since claims 32-38 depend from claim 31, Appellant contends that claims 32-38 are likewise in condition for allowance.

Claims 19 and 32: Additional Argument

In addition with respect to claims 19 and 32, Robinson in view of Musk does not teach or suggest the feature: “storing in a table for each location of the plurality of locations: an identifier of each location, the geographic coordinates of each location, and the foil coordinate of each location” (claim 19); and “a table that stores, for each location of the plurality of locations, an identifier of each location, the geographic coordinates of each location, and the foil coordinate of each location” (claim 32).

The Examiner’s Answer, pages 12-13 argues: “Regarding dependent claim 19, Robinson teaches storing an identifier of each location, the absolute coordinates of each location, and the

camera coordinates of each location in a table in sections 3 and 4.4. The each page representation in the registry maintains the associations between the coordinates and the interactors, or reference items, on the page. Robinson teaches storing camera coordinates in table called a page representation in section 3 and 4.4. Robinson does not teach storing foil coordinates because Robinson uses a camera location system instead of a touch foil system. Robinson teaches the consideration of a touch foil alternate position sensing system in section 5. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined the touch foil teaching of Robinson into the DigitalDesk system of Robinson to have created the claimed invention. It would have been obvious and desirable to have used a touch foil instead of a camera system as taught in Robinson so that the location tracking would not have been disrupted by visually blocking the line of sight between the camera lens and the stylus accidentally with the users hand or other object.”.

In response, Appellant respectfully contends that there is no disclosure in Robinson that teaches or suggests that a page representation in Robinson’s registry comprises a table. Appellant contends that a table is only one storage format of a multiplicity of storage formats that could be used to store data. Appellant has searched the text of Robinson and has found that the word “table” does not appear anywhere within the text of Robinson.

In addition, even if Robinson disclosed that the registry includes tables (which Robinson does not disclose, the language “a table” in claims 19 and 32 requires that one table (i.e., a single table) stores, for each location of the plurality of locations, an identifier of each location, the geographic coordinates of each location, and the foil coordinate of each location, which Robinson does not teach or suggest.

In addition, Appellant contends that the suggestion in the Examiner's Answer of using the touch foil instead of a camera in Robinson is not persuasive. Robinson does not teach use of foil coordinates in place of camera coordinates as alleged by the Examiner's Answer, but instead teaches that a graphics tablet could be used. Appellant maintains that a use of a graphics tablet does not imply or require use of a touch foil system. In addition, Robinson teaches away from use of a graphics tablet by reciting in the third paragraph of Robinson, Section 5: "It would be possible to use a conventional graphics tablet, but the light pen has the advantage that it works perfectly well over a stack of paper on the desk."

In addition, Appellant notes that the Examiner's Answer argues that a touch foil would replace the camera in Robinson's system, which would destroy Robinson's system since the camera is a fundamental and essential aspect of Robinson's system. For example, see Robinson, abstract, first sentence ("*This paper reports on ways of using digitised video from **television cameras** in user interfaces for computer systems*" (emphasis added)). There is no suggestion anywhere in Robinson of an alternative to using the camera.

Claims 20 and 35: Additional Argument

In addition with respect to claims 20 and 35, Robinson in view of Musk does not teach or suggest the feature: "sending the computed foil coordinates to the opto-touch foil to cause illumination of positions upon the opto-touch foil corresponding to where each location of the plurality of locations appears in the physical document" (claim 20); and "means for sending the computed foil coordinates to the opto-touch foil to cause illumination of positions upon the opto-touch foil corresponding to where each location of the plurality of locations appears in the

physical document” (claim 35).

The Examiner’s Answer, page 13 argues: “Regarding dependent claim 20, Robinson teaches sending coordinates to the projector that illuminates a corresponding position on the physical document responsive to the projector coordinates. Robinson does not teach use foil coordinates or an opto-touch foil because Robinson uses a camera-projector system to read input from the user and display feedback to the user. Robinson teaches the consideration of a touch foil alternate position sensing system in section 5. Thompson teaches a transparent organic LED (TOLED) display for presenting feedback to a user in the abstract and fig. 2. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined the teachings of Thompson and Robinson to have created the claimed invention. It would have been obvious and desirable to have used the touch foil taught by Robinson and the TOLED of Thompson to have improved Robinson so that the position could have been sensed and feedback presented to the user without the user's hand or input pen interfering with either the sight of the input camera or the projection of the feedback projector of Robinson.”

In response, Appellant respectfully contends that the suggestion in the Examiner’s Answer of using the touch foil instead of a camera in Robinson is not persuasive. Robinson does not teach use of foil coordinates in place of camera coordinates as alleged by the Examiner’s Answer, but instead teaches that a graphics tablet could be used. Appellant maintains that a use of a graphics tablet does not imply or require use of a touch foil system. In addition, Robinson teaches away from use of a graphics tablet by reciting in the third paragraph of Robinson, Section 5: “It would be possible to use a conventional graphics tablet, but the light pen has the advantage that it works perfectly well over a stack of paper on the desk.”

In addition, Appellant notes that the Examiner's Answer argues that a touch foil would replace the camera in Robinson's system, which would destroy Robinson's system since the camera is a fundamental and essential aspect of Robinson's system. For example, see Robinson, abstract, first sentence ("*This paper reports on ways of using digitised video from **television cameras** in user interfaces for computer systems*" (emphasis added)). There is no suggestion anywhere in Robinson of an alternative to using the camera.

Moreover, the Examiner's Answer has not cited any reference that discloses having an opto-touch foil cause illumination of positions upon the opto-touch foil corresponding to where each location of the plurality of locations appears in the physical document. Also, the Examiner's Answer has not provided any evidence from the prior art that provides motivation for having an opto-touch foil cause illumination of positions upon the opto-touch foil corresponding to where each location of the plurality of locations appears in the physical document.

Claims 21 and 36: Additional Argument

In addition with respect to claims 21 and 36, Robinson in view of Musk does not teach or suggest the feature: "responsive to a first location of the plurality of locations being selected in the electronic document, sending the foil coordinates of the first location to the opto-touch foil to cause blinking of light at a first position upon the opto-touch foil corresponding to where the first location appears in the physical document" (claim 21); and "means for sending foil coordinates of a first location of the plurality of locations to the opto-touch foil to cause blinking of light at a first position upon the opto-touch foil corresponding to where the first location appears in the physical document, said means for sending responsive to the first location being selected in the

electronic document” (claim 36)..

The Examiner’s Answer, pages 13-14 argues: “Regarding dependent claim 21, Robinson teaches responsive to a first location of the plurality of locations being selected in the electronic document, sending the coordinates of the first location to the camera-projector system to cause an animation, which **could be** a blinking of light, at a first position upon the DigitalDesk corresponding to where the first location appears in the physical document in sections 3, 4.3, and 5” (emphasis added).

In response, Appellant respectfully maintains that the contention in the Examiner’s Answer that an animation in Robinson “could be a blinking light” is speculative and thus not persuasive for demonstrating that Robinson teaches or suggests having “an opto-touch foil to cause blinking of light at a first position upon the opto-touch foil corresponding to where the first location appears in the physical document”.

The Examiner’s Answer, page 38 further argues: “Robinson teaches animated visual feedback for the user in fig. 1, the abstract, section 5, and section 6. Blinking light is an animated visual feedback and Robinson is certainly capable of blinking light.”

In response, Appellant respectfully contends that the preceding argument in the Examiner’s Answer is not persuasive, because whether blinking light is an animated visual feedback is irrelevant and whether Robinson is capable of blinking light is also relevant. What is relevant is that Robinson does not teach or suggest “blinking of light” as recited in claims 21 and 36.

Claims 22 and 33: Additional Argument

In addition with respect to claims 22 and 33, Robinson in view of Musk does not teach or suggest the feature: “storing an address of a second electronic document in the table” (claim 22); and “wherein the table further stores an address of a second electronic document in the table” (claim 33).

The Examiner’s Answer, page 14 argues: “Regarding dependent claim 22, Robinson teaches storing an address of a second electronic document in the table in sections 3 and 4.4.”.

In response, Appellant respectfully contends that the preceding argument by the Examiner’s Answer is incorrect, because Robinson does not teach storing an address of a second electronic document in the table in sections 3 and 4.4.

Claims 24 and 37: Additional Argument

In addition with respect to claims 24 and 37, Robinson in view of Musk does not teach or suggest the feature: “wherein the opto-foil comprises a touch foil and a transparent light emitting foil such that the touch foil is adapted to being directly touched or pressed and the light emitting foil is disposed between the touch foil and the physical document”.

The Examiner’s Answer, page 14 argues: “Regarding dependent claims 24, Robinson does not teach use of an opto-touch foil because Robinson uses a camera-projector system to read input from the user and display feedback to the user. Robinson teaches the consideration of a touch foil alternate position sensing system in section 5. Thompson teaches a transparent organic LED (TOLED) display for presenting feedback to a user in the abstract and fig. 2. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have

combined the teachings of Thompson and Robinson to have created the claimed invention. It would have been obvious and desirable to have used the touch foil teaching of Robinson and the TOLED of Thompson to have improved Robinson so that the position could have been sensed and feedback presented to the user without the user's hand or input pen interfering with either the sight of the input camera or the projection of the feedback projector of Robinson.”

In response, Appellant respectfully contends that the suggestion in the Examiner’s Answer of using the touch foil instead of a camera in Robinson is not persuasive. Robinson does not teach use of foil coordinates in place of camera coordinates as alleged by the Examiner’s Answer, but instead teaches that a graphics tablet could be used. Appellant maintains that a use of a graphics tablet does not imply or require use of a touch foil system. In addition, Robinson teaches away from use of a graphics tablet by reciting in the third paragraph of Robinson, Section 5: “It would be possible to use a conventional graphics tablet, but the light pen has the advantage that it works perfectly well over a stack of paper on the desk.”

In addition, Appellant notes that the Examiner’s Answer argues that a touch foil would replace the camera in Robinson’s system, which would destroy Robinson’s system since the camera is a fundamental and essential aspect of Robinson’s system. For example, see Robinson, abstract, first sentence (“*This paper reports on ways of using digitised video from **television cameras** in user interfaces for computer systems*” (emphasis added)). There is no suggestion anywhere in Robinson of an alternative to using the camera.

In addition, the Examiner’s Answer has based the argument in the Examiner’s Answer for utilizing Thompson under the false assumption that “Thompson teaches a transparent organic LED (TOLED) display for presenting feedback to a user in the abstract and fig. 2.” Appellant

respectfully maintains that Thompson does not teach a transparent organic LED (TOLED) display for presenting feedback to a user. Rather, Thomson teaches use of a low-reflectance absorber arranged behind the TOLED display in order to allow substantially all light incident on the TOLED display to pass through the TOLED display and be absorbed by the low-reflectance absorber, in order to improve the contrast of images displayed by the TOLED display (see Thompson, abstract).

Claims 25 and 38: Additional Argument

In addition with respect to claims 25 and 38, Robinson in view of Musk does not teach or suggest the feature: “responsive to the opto-touch foil being pressed or touched at a first position corresponding to where a first location of the plurality of locations appears in the physical document, causing a blinking of light at the first position and highlighting the first location in the electronic document” (claim 25); and “means for causing a blinking of light at a first position corresponding to where a first location of the plurality of locations appears in the physical document; and means for highlighting the first location in the electronic document, said means for sending and said means for highlighting responsive to the opto-touch foil being pressed or touched at the first position” (claim 38).

The Examiner’s Answer, pages 14-15 argues: “Regarding dependent claim 25, Robinson teaches responsive to the DigitalDesk being activated at a first position corresponding to where a first location of the plurality of locations appears in the physical document, causing an animation, which **could be** a blinking of light, at the first position and highlighting the first position in the electronic document in sections 3, 4.3, and 5” (emphasis added).

In response, Appellant respectfully maintains that the contention in the Examiner's Answer that an animation in Robinson "could be a blinking light" is speculative and thus not persuasive for demonstrating that Robinson teaches or suggests "responsive to the opto-touch foil being pressed or touched at a first position corresponding to where a first location of the plurality of locations appears in the physical document, causing a blinking of light at the first position and highlighting the first location in the electronic document."

In response, Appellant respectfully maintains that the contention in the Examiner's Answer that an animation in Robinson "could be a blinking light" is speculative and thus not persuasive for demonstrating that Robinson teaches or suggests having "an opto-touch foil to cause blinking of light at a first position upon the opto-touch foil corresponding to where the first location appears in the physical document".

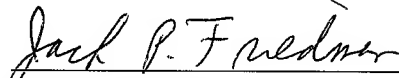
The Examiner's Answer, page 40 further argues: "Robinson teaches animated visual feedback for the user in fig. 1, the abstract, section 5, and section 6. Blinking light is an animated visual feedback and Robinson is certainly capable of blinking light."

In response, Appellant respectfully contends that the preceding argument in the Examiner's Answer is not persuasive, because whether blinking light is an animated visual feedback is irrelevant and whether Robinson is capable of blinking light is also relevant. What is relevant is that Robinson does not teach or suggest "blinking of light" as recited in claims 25 and 38.

SUMMARY

In summary, Appellant respectfully requests reversal of the March 15, 2006 Office Action rejection of claims 1-10, 18-25 and 31-38.

Respectfully submitted,



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